

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: Gwendolyn A. Parker
Leon . L Parker**

Debtors

MTGLQ Investors, LP

Movant

vs.

**Gwendolyn A. Parker
Leon . L Parker**

Respondents

BK NO. 17-15382 ELF

Chapter 13

Hearing Date: 10/17/17

**OBJECTION OF MTGLQ INVESTORS, LP
TO CONFIRMATION OF CHAPTER 13 PLAN**

MTGLQ Investors, LP (hereinafter Secured Creditor), objects to confirmation of Debtor's Chapter 13 plan and asserts in support of its Objection as follows:

1. Arrears are estimated to be \$44,909.65 and the total pre-petition debt is estimated to be \$137,294.68, as will be shown on the Proof of Claim that will be filed by the Bar date established by this court.
2. Debtor's Plan provides for payment in the amount of \$12,000.00 towards the arrearage claim of the Secured Creditor.
3. Further, Debtor's Plan states the total amount claimed as \$48,000.00.
3. Debtor's Plan understates the arrearage amount of the Secured Creditor's claim by \$32,909.65 and understates the total pre-petition debt by \$89,294.68, and does not provide sufficient funding to pay said claim including present value interest.
4. Accordingly, Debtor's Plan is not feasible, as it does not fully compensate the Secured Creditor.
5. In addition, the Debtor's Plan fails to comply with 11 U.S.C. §§ 1322 and 1325.
6. Debtors are delinquent in plan payments to the Chapter 13 Trustee in the amount of \$775.00.

WHEREFORE, the Secured Creditor, MTGLQ Investors, LP, prays that the Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

Date: October 13, 2017

By: /s/ Rebecca A. Solarz, Esquire
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